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REVIEW NO.

	EEB REVIEW
DATE IN: ASSIGNED	6-10-91 OUT: JUL   9 1991
CASE # : SUB. # :	282551 REREG CASE #:  S397104 LIST A, B, C, D  91TX0023
DATE OF SUBMISSION _	6-3-91
DATE RECEIVED BY EFE	D 6-10-91
SRRD/RD REQUESTED CO	MPLETION DATE
EEB ESTIMATED COMPLE	TION DATE
SRRD/RD ACTION CODE/	TYPE OF REVIEW510 S 18
MRID #(S)	. i
DP TYPE 001	
PRODUCT MANAGER, NO.	LIBBY PEMBERTON 41 REBECCA COOL
PRODUCT NAME(S)F5FENVALERATE	
TYPE PRODUCT	INSECTICIDE
COMPANY NAME	TEXAS DEPT OF AGRICULTURE
SUBMISSION PURPOSE F	REVIEW PROPOSED SECTION 18 FOR USE
<u>,</u>	FEFENVALERATE IN TEXAS ON SORGHUM
<u>/</u>	
COMMON CHEMICAL NAME	3
DEVIEWED. MIKE REX	RODE



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

· July 100

JUL 1 9 1991

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

## MEMORANDUM

SUBJECT:

Possible Crisis Declaration by the State of Texas

for the Use of ASANA XL on Sorghum

FROM:

James Akerman, Chief

Ecological Effects Branch

Environmental Fate and Effects Division

TO:

Becky Cool

Emergency Response and Minor Use Section

Registration Division

The Texas Department of Agriculture (TDA) is presently considering a Crisis Declaration for the use of ASANA XL to control sorghum midge (Contarinia sorghicola) and the corn earworm (<u>Helcoverpa</u> <u>zea</u>). Application (air or ground) rate is designated at 0.025 to 0.05 ai/A with 2 applications per season. The TDA has further estimated that 150,000 acres of sorghum should be designated for spraying in the following counties: upper Coastal Bend effective immediately (June 14, 1991) -- Refugio, Calhoun, Victoria, Jackson, Matagorda, Wharton, Brazoria, Fort Bend, Harris, Galveston, Liberty, Chambers, and Jefferson. Beginning on July 5, 1991, esfenvalerate is authorized for use on sorghum in the following counties in the upper Blackland--McLennan, Bosque, Hill, Navarro, Ellis, Johnson, Tarrant, Dallas, Kaufman, Rockwall, Hunt, Collin, Denton, Cooke, Grayson, Fannin, Lamar and Delta. Beginning on August 6, 1991, esfenvalerate is authorized for use on sorghum for seed purposes in the following counties in the High Plains --Deaf Smith, Oldham, Hartley, Dallam, Sherman, Moore, Potter, Randall, Hansford, Hutchinson, Carson, Armstrong, Ochiltree, and Gray.

Presently, ASANA is registered for use on corn and cotton which amount for a total of about 733,000 acres in these designated counties. An additional 250,000 acres to this total, amounts to a 34% increase acreage over the registered use.

Since, ASANA is persistent in the aquatic environment and highly toxic to aquatic life (LC50 = 0.005 to 2 ppb), EEB has a concern for impact to nontarget aquatic organisms that may be effected via drift or runoff from adjacent fields. Spraying of ASANA in two of the designated regions, upper coastal bend and the upper Blackland, may result in an incremental risk to aquatic organisms (especially the shrimp industry adjacent to upper coastal bend). Exposure from runoff and drift in this area can result in an incremental risk to aquatic organisms (especially the shrimp industry adjacent to upper coastal bend). Exposure from runoff and drift in this area can result in residues of 0.03 and 0.154 ug/L, respectively, that exceed our concerns for unacceptable risk.

At this time, EEB can not complete a risk assessment for ASANA because relevant ecological effects data (mesocosm study) has not been reviewed. Until this assessment is completed, any expansion of the ASANA use could result in an incremental risk to aquatic organisms. If there are any comments, please contact Miachel Rexrode (557-0578)